



CITY OF THE DALLES
Department of Public Works
1215 West First Street
The Dalles, Oregon 97058

April 25, 2016

Mr. Casey Gatz
Barlow Ranger District, USFS
780 NE Court Street
Dufur, OR 97021

RE: Comments related to the proposed Dog River Pipeline Replacement Project

Dear Casey,

The City of The Dalles offers the following comments in response to the Public Scoping for the proposed Dog River Pipeline Replacement Project.

Project Need and Scope

The Dog River Pipeline is a 100+ year old wood-stave water transmission pipeline through which an inter-basin transfer of water, from Dog River to South Fork Mill Creek, occurs as part of the City of The Dalles water system. The pipeline currently carries 54% of the City's annual municipal water supply and, as such, is a critical and essential element of the City's municipal water system. The pipeline is deteriorated, leaking, and at risk of catastrophic failure. The project will replace the aged wooden pipeline with a ductile iron pipe; ductile iron has been selected over other potential materials due to constructibility issues and a desire to minimize the project's environmental footprint (ductile iron pipe with its shorter pipe sections can be laid in a narrower construction corridor than can some other alternative materials) and durability in freezing conditions. It is anticipated that the new pipeline will have a service life of 100 years.

The current wooden pipeline has a capacity of 7.95 million gallons per day (mgd). It is estimated that, at full flows, approximately 1 mgd is currently being lost due to leakage. The project to replace the pipeline will eliminate this leakage and, since only the amount of water needed for municipal needs is diverted from Dog River, less water will be diverted from Dog River to meet those needs after the project is completed. The capacity of the new pipeline will be 17 mgd to meet future municipal demands.

The City, as the project applicant, is proposing to voluntarily (since not required by state or federal regulations) install fish screens on the pipeline intake and upstream fish passage structures where none currently exist in Dog River. Both screening and passage systems are proposed to be constructed, installed and operated consistent with ODFW guidance.

It is also proposed that the project will install an arch culvert on an unimproved Forest Service road where vehicles currently ford Brooks Meadow Creek and are causing stream damage and increased stream turbidity; the culvert will remain as a permanent improvement that will benefit the stream system and the Forest Service transportation system. All of these project elements will provide environmental benefits over current conditions.

Agreements and Permits

The City currently holds a water right with a priority date of 1870 that is adequate to support this project; this is the only water right on this segment of Dog River and no new water rights are needed for the project. There are no “competing” or “unmet” in-stream water rights in the project area.

The City has a Cooperative Agreement with the US Department of Agriculture, dated 1912, which identifies that management of The Dalles Municipal Watershed, wherein the proposed project is located, will be “for the purpose of conserving and protecting the water supply” for City of The Dalles. The City has also entered into a Memorandum of Understanding with the Forest Supervisor, Mt. Hood National Forest, 1972, which states that “The principal and most important use of this watershed is as a municipal water supply.” The current pipeline is operated and maintained under a Special Use Permit with the Forest Service; the proposed project is allowed under the existing permit. These agreements identify the City and Federal management objectives of a municipal water supply and, therefore, support the project.

Pipeline Operations

The Dog River Pipeline is utilized year round for the diversion of water from Dog River to the South Fork Mill Creek and is responsible for conveyance of about 54% of the City’s annual water supply. Diverted water is used to supply both the live flow needs of the City’s Wicks Water Treatment Plant which receives water from South Fork Mill Creek, and the storage needs of filling Crow Creek Reservoir where water is impounded on South Fork Mill Creek for controlled release during summer months to augment summer stream flows to the treatment plant.

The pipeline is operated so that only the amount of water needed for municipal purposes is diverted from Dog River. Summer time flows in Dog River normally range around 1-2 mgd while summer water demands in the City run around 6 mgd. During the summer, the pipeline diverts all available water from Dog River (approximately 13-25% of the existing pipeline capacity) to help meet these demands. In the fall and early winter, as Dog River flows increase, available Dog River flows are diverted up to the capacity of the pipeline (7.95 mgd) to refill Crow Creek Reservoir. As mentioned before, approximately 1 mgd is currently lost due to leakage at full-pipe conditions. Once the reservoir is full, diverted flows are reduced to about 2 mgd for the remainder of the winter and early spring; diverted flows are estimated to average about 2% of the mean monthly flow February to August. Crow Creek Reservoir normally fills by the first of February and the pipeline diversion flows are decreased to about 2 MGD by the time spring runoff occurs and Dog River flows normally peak. USGS streamflow data for Dog River (water years 1960-1971) at the City’s point of diversion shows that mean monthly stream flows are 3.5 mgd or less October through January which, on average, amounts to about 44 percent of the pipeline’s capacity. As is evident, increasing the capacity of the pipeline will not lead to increased water diversions during summer months and elimination of existing leakage will benefit Dog River flows.

Other Related Issues

As a municipality, the City of The Dalles has a recognized Duty to Serve its residents and businesses with reliable and adequate supplies of safe drinking water. It must also plan for future needs. Because of the previously-mentioned agreements and the reliability of The Dalles Municipal Watershed as a water supply, of which Dog River is a critical part, the City’s water system infrastructure is built around this source at a cost of many millions of dollars. There are very limited alternatives available to the City for future water supplies. The federal government has restricted any new withdrawals from the Columbia River without somehow replacing the same amount of water back into the river, thereby severely limiting the availability of that source to the City. The State of

Oregon has designated The Dalles as a Critical Groundwater Area thereby eliminating the possibility of obtaining any new groundwater rights. That leaves Dog River and South Fork Mill Creek as the only viable sources to develop as water supplies for the City.

It's also important to understand that there are significant large water rights and users located downstream of this proposed project, outside of federally-managed lands, that have the controlling impact on stream flows and aquatic habitat. Even if this proposed project were not to be developed, those withdrawals would continue to occur and aquatic habitats would be limited.

Project Support

Attached is a Letter of Support from Rod French, Oregon Department of Fish and Wildlife District Fish Biologist, identifying multiple environmental benefits of the project.

I appreciate the opportunity to comment on this proposed project. I hope this information is helpful in the analysis of the Proposed Action for the Dog River Pipeline Replacement Project. Further, I urge the Forest Service to honor the commitments that have been made to the City regarding the City's municipal water supply and approve the project.

If you or any of the IDT staff have any questions, please feel free to contact me at your convenience.

Sincerely



Dave Anderson
Public Works Director
City of The Dalles



Oregon

Kate Brown, Governor

Department of Fish and Wildlife
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January 8, 2016

Oregon Water Resources Department
Jon Unger-Water Resources Grant Administrator
725 Summer St. NE, Suite A
Salem, OR 97301

Re: Support for Dog River Pipeline Replacement Project

Dear Mr. Unger:

The Oregon Department of Fish and Wildlife (ODFW) supports the City of The Dalles grant application for the replacement of the Dog River Pipeline. The current pipeline is over 100 years old, has considerable leakage issues, and the diversion is not equipped with a fish ladder, or fish screen. This project proposes replacing the pipeline, along with constructing an ODFW approved fish ladder and screen on the diversion.

The Dog River Pipeline diverts water from Dog River, a tributary to the Hood River, where it is ultimately used by the city of The Dalles in its municipal supply. The Hood River has four fish species that are currently listed as a threatened species under the Endangered Species Act (ESA). Diminished streamflow has been identified as a key limiting factor in the recovery of ESA fish throughout the Hood River Basin. Replacement of the leaking pipeline will increase spring and early summer streamflow in Dog River up to 1.5 cubic feet per second. Additionally, water from the Dog River diversion augments streamflow in Mill Creek, which is critical habitat for ESA threatened Middle Columbia steelhead. Stream flow is also limited in Mill Creek, and any increased flow provides a benefit to the aquatic environment.

There are several miles of miles of occupied fish habitat for resident cutthroat trout upstream of the current diversion for the Dog River pipeline. The current diversion structure for the pipeline on the Dog River is not equipped with a fish screen, to prevent fish from being entrained in the pipeline, or any type of fish ladder to allow fish passage around the diversion structure. This project proposes building a fish ladder and fish screen, which prevent fish from being entrained into the pipeline, and will permit volitional passage around the diversion. This will provide a significant benefit to resident cutthroat trout residing in Dog River.

Implementation of this project has potential to provide substantial benefits to fisheries resources in the Hood River Basin, Dog River, and Mill Creek. The ODFW supports this proposal, and urges the Oregon Water Resources to consider this project for grant funding.

Sincerely,

Rod A. French
Mid-Columbia District Fish Biologist